

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 97-88/18 Phase II

Respondent: Peter Shepherd

Title: Director

REQUEST: New England Public Communications Council, Set #4

DATED: October 19, 2001

ITEM: NEPCC 4-1 Reference is made to Attachment II to the Panel Rebuttal Testimony (“Testimony”).

- a. Please provide all “Redacted Data” for the Attachment that is missing from the blank columns.
- b. Please explain what is meant by “Rate Center” at the top of the second column. Is “Rate Center” the same as “Wire Center?” If not, please explain the difference.
- c. Please explain what is meant by “CLLI” at the top of the third column, including what word is associated with each letter in the acronym.
- d. Please explain what is meant by “Acc Lines” at the top of the fifth column. Please explain the meaning of the corresponding numbers in that column underneath the term “Acc lines.”

REPLY:

- a. (Objection by Counsel) Verizon MA objects to this request because the redacted data is irrelevant to this proceeding and contains highly competitively sensitive marketing information that would identify all Public Access Lines (“PALs”) and Public Access Smart-pay Lines (“PASLs”) by specific rate center (*e.g.*, exchange) throughout Massachusetts. Verizon MA’s Attachment II responds to NEPCC witness’ allegations regarding the relative density distribution for loops of PALs versus PASLs. The complete statewide density zone distribution data is contained in the redacted version. Therefore, no additional information is required.

NEPCC's request that Verizon MA further quantify the density zone data on Attachment II by populating the rate

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REPLY: NEPCC 4-1
(cont'd)

center and CLLI columns is not relevant because the exact number of PALs and PASLs by specific rate center is not an issue in this proceeding. More important, that level of detail would reveal *invaluable* marketing data regarding those rate centers with high concentrations of PASLs that is not generally known to payphone service providers ("PSPs") and thus would be considered highly competitively sensitive. Such data would enable PAL subscribers (*e.g.*, NEPCC) to target their marketing strategy to those rate centers with a larger PASL presence in an attempt to displace Verizon MA's payphones (as the largest user of PASLs) in certain Massachusetts exchange areas. This would unfairly disadvantage Verizon MA and unjustly benefit its competitors.

If directed, Verizon MA is willing to provide an unredacted copy of Attachment II to the Department only, and strictly on a highly proprietary basis, not for disclosure to intervenors in this proceeding.

- b. The terms "rate center" and "exchange" have the same meaning for purposes of this Reply. The heading was intended to designate the exchange in which the access lines are provided. Wire centers refer to a central office building location that are located within an exchange. The difference between a wire center and a rate center is that rate centers are assigned Vertical and Horizontal ("V&H") coordinates that correspond to a municipal location while wire center V&H coordinates correspond to central office building location coordinates. Rate center V&H coordinates are used by telephone utilities to apply distance related charges for interexchange services such as private lines or toll services. Wire center V&H coordinates are used by telephone utilities to apply distance related charges to services or unbundled network elements that are provided to other Common Carriers on a wholesale basis.
- c. "CLLI" means Common Language Location Identification and is code that is used for mechanization in various customer service, provisioning, engineering, maintenance and billing systems to identify physical locations and entities such as wire centers.

- d. The column “Acc Lines” provides the quantity of payphone access lines that are provided in each of the respective rate centers and density zone associated with that rate center.

REPLY: NEPCC 4-1
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ITEM: NEPCC 4-2 Reference is made to pages 4-5 of the Testimony at lines 21 through 1.

- a. Please define the term “smart payphones” as used in line 1 of Page 5.
- b. Please identify all PSPs that are using PASLs “to provide payphone service using ‘smart’ payphones.”

REPLY:

- a. The term “smart payphones” generally refers to payphones in which the customer-provided equipment (“CPE”) instrument implements functionalities, such as coin deposits, collection/return, timing and rating as well as screening and store and forward type functions, by means of micro-processor technologies incorporated into the payphone instrument.
- b. Verizon MA objects to this request on the grounds that the information requested would be considered Customer Proprietary Network Information of third-party competitive providers. The Company is not at liberty to produce or disclose such competitively sensitive business information without express third-party consent. Notwithstanding this objection, Verizon MA responds as follows.

On an aggregate basis, 14 PSPs are using PASLs to provide payphone service in Massachusetts. The information available does not indicate the nature of the CPE used by those PSPs. However, Verizon MA is generally aware of PSPs using smart CPE with PASLs because of the greater degree of fraud protection inherent with PASLs.

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ITEM: NEPCC 4-3 Reference is made to page 4 of the Testimony at line 7-8, please define the term "sub-service level" as used in that context.

REPLY: PALs and PASLs are a sub level of basic payphone service.

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Respondent: Fredrick K. Miller

Title: Senior Specialist

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ITEM: NEPCC 4-4 Reference is made to page 9 of the Testimony at line 2-3, please define "Network Access Lines (TELRIC)" as used in the chart at the top of page 9.

REPLY: This refers to the number of business (including payphone) and residence switched lines and non-switched lines (such as private line and Digital Data Service local channels) included in the 1997 TELRIC Loop Study.

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DATED: October 19, 2001

ITEM: NEPCC 4-5 Reference is made to page 12 of the Testimony at line 18, please define the term “multiplexed” as used in that context.

REPLY: Multiplexing in this context means the combining of digital signals for individual lines with other lines onto a single, yet higher bit rate transmission facility by means of time division multiplexing. This enables the transmission facility to be shared by all of the multiplexed lines, rather than each line having its own individual transport facility between the remote terminal and the central office.

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ITEM: NEPCC 4-6 Reference is made to page 14 of the Testimony, at line 8, please provide a copy of the referenced Order in DTE 98-57 III-A.

REPLY: See the attached Order.

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ITEM: NEPCC 4-7 Reference is made to page 15 of the Testimony at Line 6-7. What services are provisioned over UDLC systems?

REPLY: UDLC, which is an earlier generation of digital loop carrier, can be used to provide the same POTS services that are provided using an IDLC.

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ITEM: NEPCC 4-8 Reference is made to Attachment II to the Testimony, Summary Page. Please explain the process whereby the Redacted Data was translated into the Summary Page.

REPLY: The access line quantities on each row with a rural density zone designation were added to arrive at a total number of access lines for the rural density zone. This was also performed for the suburban, urban and metro density zones, respectively.

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